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May 21, 2008

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: In the Matter of MCImetro Access Transmission Services, L.L.C., d/b/a Verizon
Access Transmission Services' Tariff Filing to Introduce a Toll Free 8YY Transit
Traffic Service, Tariff No. 2008-62
Docket No.

Dear Mr. Terreni:

Enclosed for filing is the Petition of AT&T Companies to Institute Investigation of
Verizon Access Tariff Filing and to Intervene in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this petition as
indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
711768



In the Matter of MCI Metro Access)
Transmission Services, L.L.C., d/b/a) Docket No. _____
Verizon Access Transmission Services')
Tariff Filing to Introduce a Toll Free 8YY)
Transit Traffic Service, Tariff No. 2008-62)

AT&T Communications of the Southern States, LLC (“AT&T Communications”), BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T South Carolina”), and BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service (“AT&T Long Distance Service”) (collectively, the “AT&T Companies”) respectfully request the Public Service Commission of South Carolina (“the Commission”) to: (1) initiate an investigation of the tariff filing by MCImetro Access Transmission Services, L.L.C., d/b/a Verizon Access Transmission Services (“Verizon Access”) to introduce 8YY Toll Free Transit Traffic Service¹; (2) allow the AT&T Companies, pursuant to S.C. Code Regs. §103-825, to intervene and participate as parties of record in that investigation; and (3) either suspend the tariff filing during the pendency of the investigation or require Verizon Access to “true up” any and all activity (including without limitation billing) under the tariff filing to comply with any decision the Commission may render as a result of that investigation.

1. By letter dated April 21, 2008, Verizon Access submitted its tariff filing to the Commission and requested an effective date of April 24, 2008. By letter dated May 5, 2008, the

¹ Attachment A to this Petition is a copy of this tariff filing.

Commission's Program Coordinator informed Verizon Access that its tariff filing had been received and assigned Tariff No. 2008-62. The Commission's letter indicated that Verizon Access' tariff would be considered "in accordance with Flexible Regulation approved by the Commission via Order No. 2002-601 in Docket No. 2002-260-C." Ordering paragraph 2 of that earlier order specified that Verizon Access' tariff filings are "subject to the Commission's right within thirty (30) days to institute an investigation of the tariff filing," in which case "the tariff filing will be suspended until further Order of the Commission."²

II. SUMMARY OF THE AT&T COMPANIES' CONCERNS WITH THE TARIFF FILING

2. Verizon Access' tariff filing is vague and ambiguous in that it inadequately describes the service itself and how Verizon Access intends to bill for the service. For example, the AT&T Companies are concerned that, as written, the tariff filing could be read as allowing Verizon Access to charge for access service components it may not actually be providing. The tariff filing also does not require complete compliance with the Multiple Exchange Carrier Access Billing ("MECAB") guidelines to ensure that all carriers handling this type of traffic have the necessary records to bill for the services provided to complete these calls.

3. As acknowledged by Verizon Access' letter to the Commission dated May 16, 2008, the AT&T Companies have been participating, and will continue to participate, in good-faith discussions with Verizon Access. The AT&T Companies hope to be able to resolve their concerns with Verizon Access on a business-to-business basis. In order to protect their legal rights, however, the AT&T Companies respectfully request that the Commission initiate an investigation into the tariff filing and either suspend the tariff during the pendency of the investigation or require Verizon Access to "true up" any and all activity (including without

² The AT&T Companies do not waive, and expressly preserve, their rights to argue, if necessary, that the Verizon Access tariff filing that is the subject of this Petition is not a "local tariff filing" but is, instead, an access service tariff filing that the Commission can also investigate and/or suspend as requested by this Petition.

limitation billing) under the tariff filing to comply with any decision the Commission may render as a result of that investigation.

III. GROUNDS SUPPORTING REQUEST FOR INVESTIGATION

4. AT&T Communications and AT&T Long Distance Service pay Verizon Access both originating and terminating intrastate switched access rates on intrastate interexchange calls placed by their customers.

5. AT&T South Carolina pays Verizon Access intrastate terminating switched access rates to terminate intrastate interexchange calls placed by AT&T South Carolina's customers and may be required to pay originating intrastate switched access under Verizon Access' tariff filing.

6. The AT&T Companies have a significant interest in ensuring that Verizon Access' intrastate switched access rates are lawful and appropriate.

7. At a minimum, the AT&T Companies submit that the Commission should investigate the following concerns regarding Verizon Access' Toll Free 8YY Transit Traffic Services tariff filing:

(a) Disaggregation Needed to Avoid Overbilling. The AT&T Companies believe that the proposed transit charges should be disaggregated to ensure that only the applicable portion of the blended rate is charged. Verizon Access' tariff filing states that "[n]o charges for the carrier common line charge, the local switching charge nor the end office port charge are incorporated into the rate."³ The filing's transit rates, however, blend the rate elements that are being applied. This blending prevents the identification of what specific access elements are being applied and a verification of whether those functions are being provided (as well as how the billed charges are calculated). The blended rates create the potential that Verizon Access could overbill IXCs for functions that it does not perform.

³ Verizon Access tariff filing, §5.2.3.1.4.

(b) Compliance with MECAB. Verizon Access' tariff filing states that "[r]ecords exchange, rating, and billing for Toll Free 8YY Transit Traffic Service is subject to the provisions of the [MECAB]."⁴ The tariff filing, however, fails to make clear that the third party providers with whom Verizon Access interconnects must comply with MECAB. According to the MECAB guidelines, all providers on the route must agree to comply with MECAB prior to implementation. Lack of agreement with the third parties will likely result in inaccurate billing and allow such third parties to send traffic originating outside the LATA and/or state to AT&T South Carolina for hand-off to an IXC, which is in clear violation of AT&T South Carolina's switched access tariff.⁵ When Verizon Access is jointly providing the service addressed in its tariff filing with more than one LEC, it is important that all LECs that are involved agree on a billing arrangement that is consistent with MECAB guidelines and AT&T's switched access tariff.⁶ Moreover, Verizon Access' tariff must make clear that there should be coordination and record exchange requirements among the involved LECs in jointly provisioning toll free inter-exchange delivery service under the proposed tariff.

(c) Potential Over-Recovery. Verizon Access' tariff filing offers both a Direct and an Indirect Transit option. With regard to the Direct Transit option, the tariff filing provides that "[i]f the 8YY call is delivered to the IXC over DEOTs,⁷ the Toll Free 8YY Direct Transit Minute of Use Rate will apply."⁸ The Direct Transit Minute of Use Rate, in turn, is \$0.001154.⁹ The AT&T Companies question whether it is appropriate for Verizon Access to bill an IXC for the full DEOT

⁴ Verizon Access tariff filing, §5.2.3.1.4.

⁵ See AT&T South Carolina Access Services Tariff §E6.1 (the company's switched access service "provides for the ability to originate calls from an end user's premises to an IC's terminal location, and to terminate calls from and IC's terminal location to an end user's premises *in the LATA where it is provided.*"(emphasis added).

⁶ See generally *Id.*, §E2.4.8

⁷ The AT&T Companies understand "DEOT" to stand for "Direct End Office Trunk."

⁸ Verizon Access tariff filing, §7.2.3.

⁹ *Id.*, §7.4.4.3.

facility (provided as either a DS1 or a DS3 pursuant to Section 5.2.3.1.1) and to also bill the same IXC for per minute usage on calls transversing that facility.

IV. GROUNDS SUPPORTING REQUEST FOR INTERVENTION

8. AT&T Communications is a telephone utility presently providing telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.

9. AT&T South Carolina is a telephone utility presently providing telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.

10. AT&T Long Distance Service is a telephone utility presently providing telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.

11. The authorized representative for the AT&T Companies in this proceeding is:

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Columbia, South Carolina 29201
Email: pt1285@att.com
Telephone: (803) 401-2900
Facsimile: (803) 254-1731

12. The AT&T Companies have an interest in this proceeding because they will be subject to the Verizon Access tariff filing at issue in this proceeding and they have several concerns with the tariff filing, including without limitation those set forth in Paragraphs 4 through 7 above.

13. The AT&T Companies have not yet fully developed their position in this proceeding.

14. Granting the AT&T Companies' Petition to Intervene will not cause any undue delay, and it will not prejudice any party to this proceeding.

15. The AT&T Companies reserve their respective rights to testify and present evidence at any hearing in this proceeding. At this time, the AT&T Companies do not know how much time would be required for such presentation.

V. CONCLUSION

WHEREFORE, based on the foregoing, Petitioners request the following relief:

1. that the Commission initiate an investigation of Verizon Access' tariff filing (Tariff No. 2008-62);

2. that the AT&T Companies be allowed to intervene and participate as parties of record in that investigation;

3. that any parties of record be directed to provide the AT&T Companies with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding;

3 that the Commission either suspend the Verizon Access tariff filing during the pendency of the investigation or require Verizon Access to "true up" any and all activity (including without limitation billing) under the tariff filing to comply with any decision the Commission may render as a result of that investigation; and

4. that the Commission grant such other relief as it deems just and proper.

Respectfully submitted on this 21st day of May, 2008.



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ATTORNEY FOR AT&T COMMUNICATIONS,
AT&T SOUTH CAROLINA, AND AT&T LONG
DISTANCE SERVICE

ATTACHMENT A

2008-62



Litigation and Regulatory
Six Concourse Pkwy, Suite 600
Atlanta, GA 30328

April 21, 2008

Transmittal Letter No. 08-01

VIA FEDERAL EXPRESS

Honorable Charles L.A. Terreni, Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr.
Columbia, South Carolina 29210



RECEIVED
2008 APR 22 AM 9:55
SC PUBLIC SERVICE
COMMISSION

RE: Verizon Access Transmission Services: Tariff No. 2
Introduce Toll Free 8YY Transit Traffic Service

Dear Mr. Secretary:

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon Access") hereby files with your office an original and two (2) copies of revisions to its SC P.S.C. Tariff No. 2.

The following revised pages are attached:

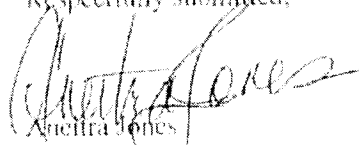
| <u>Page</u> | <u>Revision</u> |
|-------------|-----------------|
| 1 | 1 |
| 2 | 1 |
| 5 | 1 |
| 23 | 1 |
| 50 | 1 |
| 51 | 1 |
| 52 | 1 |
| 58 | 1 |
| 61 | 1 |

Verizon Access proposes to introduce Toll Free 8YY Transit Traffic Service; and respectfully requests an effective date of April 24, 2008.

Charles L.A. Terreni
April 21, 2008
Page Two

Please date stamp and return the extra copy of this filing in the enclosed self-addressed stamped envelope, indicating receipt. If you have any questions regarding this filing, please contact me either at 678-259-5239 or aneitra.jones@verizonbusiness.com.

Respectfully submitted,


Aneitra Jones
Tariff Administrator
Verizon Business

Enclosure

ACCESS SERVICES

CHECK SHEET

The Title Page and Pages 1 - 32 inclusive of this tariff are effective as of the date shown. Original and revised pages, as named below, comprise all changes from the original tariff in effect on the date indicated.

| <u>PAGE NO.</u> | <u>Revision</u> |
|-----------------|-----------------|
| Title Page | 1 |
| 1 | 1 * |
| 2 | 1 * |
| 3 | Original |
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*New to this SCS

Issued: April 22, 2008

Effective: 11/12/2008

Arietta Jones, T.U. #1 Administrator
5055 North Point Parkway
Alpharetta, Georgia 30022

MCI Metro ACCESS TRANSMISSION SERVICES LLC
D.B.A. VERIZON ACCESS TRANSMISSION SERVICES

SC P.S.C. TARIFF NO. 2
1ST REVISED PAGE NO. 2
CANCELS ORIGINAL PAGE NO. 2

ACCESS SERVICES

CHECK SHEET (Cont.)

| <u>PAGE NO.</u> | <u>Revision</u> |
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| 64 | Original |

*Not reviewed

Revised: Apr 22, 2013

Revised: April 24, 2013

Anetra Jones, Tariff Administrator
5055 North Point Parkway
Alpharetta, Georgia 30022

ACCESS SERVICES

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Access Services

REGULATIONS (Cont.)

2.3 Obligations of the Customer (Cont.)

2.3.3.1 Percent Interstate Usage (PIU) (Cont.)

2.3.3.1.2 Originating Access Originating access minutes may be based on traffic originating at the State LATA or Local Switching Center level, provided that the traffic being measured is only traffic originating from the Company Local Switching Center(s). Originating access minutes will be measured as follows, based on type of access:

2.3.3.1.2.1 For Feature Group D Switched Access Service(s), as defined in Section 5.2.1, where the Company can determine jurisdiction by its call detail, the projected Percent Interstate Usage (PIU) will be developed by the Company on a monthly basis by dividing the measured interstate originating access minutes by the total originating access minutes.

2.3.3.1.2.2 For Feature Group D with 950 Access, as defined in Section 5.5.3.1, the Customer must provide the Company with a projected PIU factor by supplying the Company with an interstate percentage of originating access minutes.

2.3.3.1.2.3 For 500, 700, 8XX, calling card and operator service access, the Customer must provide the Company with a projected PIU factor for each type of access. The Customer who provides a PIU factor shall supply the Company with an interstate percentage of originating access minutes. The PIU factor will be used to determine the jurisdiction for billing purposes of 500, 700, Toll Free 8YY, Toll Free 8YY Transit Traffic Service, calling card and operator service access. The Company will apply the PIU filed by customer for Toll Free 8YY to the 8YY Transit Traffic delivered to Customers.

N
|
N

Access Services

5. SWITCHED ACCESS SERVICES (Cont.)

5.2 Provision and Description of Switched Access Service Arrangements (Cont.)

5.2.3 Rate Categories

The following rate categories apply to Switched Access Service:

- A. Direct Connect
- B. Tandem Connect
- C. 500 Data Base Access Service
- D. Toll Free 8YY Transit Traffic Service
- E. Optional Features

N
T

5.2.3.1 Except as stated as follows, Tandem Connect Service is provided in conjunction with the tandem provider serving the area. Charges are computed in accordance with Section 2.5.2.7 preceding (Ordering, Rating, and Billing of Access Services Where More Than One Exchange Telephone Company is Involved).

5.2.3.1.1 Direct Connect The Company will provide Direct Connect between the Customer's Premises and the Company's Local Switching Center switch(es). This transmission path is Dedicated to the use of a single Customer. DS1 and DS3 facilities are available for Direct Connect Service. A DS1 facility is capable of transmitting electrical signals at a nominal 1.544 Mbps, with the capability to channelize up to 24 voice frequency transmission paths. A DS3 facility is capable of transmitting electrical signals at a nominal 44.736 Mbps, with the capability to channelize up to 672 voice-frequency transmission paths. For DS3 facilities, if the Company is required to install additional fiber optic equipment for the benefit of the Customer, then the Customer has the option to choose either an optical or electrical interface.

Effective April 24, 2009

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Access Services

5.2.1. MCImetro ACCESS SERVICES (Cont.)

5.2. Provision and Description of Switched Access Service Arrangements (Cont.)

5.2.3. Rate Categories (Cont.)

5.2.3.1. (Cont.)

5.2.3.1.2. Tandem Connect Tandem Connect consists of circuits from the Customer's tandem provider to the Company's Local Switching Center.

5.2.3.1.3. 800 Data Base Access Service

800 Data Base Access Service is a service offering utilizing originating Trunk side Switched Access Service. When an 8XX + NXX + XXXX call is originated by an End User, the Company will perform Customer identification based on screening of the full ten-digits of the 8XX number to determine the Customer location to which the call is to be routed.

The 800 Data Base charges, which consist of a single fixed rate element, apply on a per query basis.

5.2.3.1.4. Toll Free 8YY Transit Traffic Service

Toll Free 8YY Transit Traffic Service is an access service in which the Company transports Toll Free traffic originated by a third party who is not an end user or other user of the Company's local exchange or exchange access service through its wire center to an Interexchange Carrier Customer. In addition to the 800 Database Access Service described in Section 5.2.3.1.3 above, this service provides for the use of the Tandem Switching, Tandem Termination, and Tandem Transport facilities of the Company. In a Toll Free 8YY Transit Traffic Service call, the Company will charge only for 800 Data Base Access Service Basic Query, the tandem switching, and the tandem transport (termination and facility) functionalities. No charges for the carrier common line charge, the local switching charge nor the end office port charge are incorporated into the rate. The rates for Toll Free 8YY Transit Traffic Service set forth in Section 7.4.4.3 are usage sensitive. Records exchange, rating, and billing for Toll Free 8YY Transit Traffic Service is subject to the provisions of the Multiple Exchange Carrier Access Billing Guidelines (MECAB).

5.2.3.1.5. Switched Access Service Optional Feature

5.2.3.1.5.1. Nonchargeable Optional Features Where transmission facilities permit, the Company will, at the option of the Customer, provide the following nonchargeable optional feature, as described in Section 5.5.1, in association with Switched Access Service:

(a) Supervisory Signaling

5.2.3.1.5.2. Chargeable Optional Features Where transmission facilities permit, the Company will, at the option of the Customer, provide the following chargeable optional features, as described in Section 5.5.2, in association with Switched Access Service:

(a) 800 Data Base Access Service Basic Query

(b) Signaling Transfer Point Access

5.2.3.1.5.3. Feature Group D Optional Features

Following are the various optional features that are available in lieu of, or in addition to, the standard features provided with Feature Group D. Optional features are provided as Common Switching Optional Features as described in Section 5.5.3.1.

Revised: April 22, 2008

ENCLOSURE 124 2008

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Access Services

5 SWITCHED ACCESS SERVICES (Cont.)

5.2 Provision and Description of Switched Access Service Arrangements (Cont.)

5.2.3 Rate Categories (Cont.)

5.2.3.1 (Cont.)

5.2.3.1.5 Optional Features (Cont.)

T

5.2.3.1.5.3 Feature Group D Optional Features (Cont.)

T

5.2.3.1.5.3.1

Common Switching Optional Features: At the Customer's option, the following standard features are available at the rates specified in Section 7.4.7.1

T

- a) Alternate Traffic Routing
- b) Automatic Number Identification (ANI)
- c) Cut-Through
- d) Service Class Routing
- e) Feature Group D with 950 Access
- f) Signaling System Seven (SS7)
- g) Basic Initial Address Message Delivery
- h) Called Directory Number Delivery
- i) Flexible Automatic Number Identification Delivery

Access Services

7. SWITCHED ACCESS RATES

This section contains the specific regulations governing the rates and charges that apply for Switched Access Services.

7.1 There are three types of rates and charges that apply to Switched Access Service. These are monthly Recurring Charges, usage rates and Non-Recurring Charges.

7.1.1 Monthly Recurring Charges Monthly Recurring Charges are flat rates for facilities that apply each month or fraction thereof that a specific rate element is provided.

7.1.2 Usage Rates Usage rates are rates that are applied on a per access minute or per query basis. Usage rates are accumulated over a monthly period.

7.1.3 Non-Recurring Charges Non-Recurring charges are one-time charges that apply for a specific work activity (i.e., installation of new service or change to an existing service).

7.1.3.1 Installation of Service Non-Recurring charges apply to each Switched Access Service installed. The charge is applied per line or Trunk.

7.2 Application of Rates

7.2.1 Direct Connect The Direct Connect rate is assessed on a per minute of use basis. The rate will vary based on whether the traffic is originating or terminating.

The Tandem Overflow rates will apply, based on the option chosen, for all Direct Connect usage which overflows to the Access Tandem.

Rates and charges for Direct Connect and Tandem Overflow are set forth in Section 7.4.4.1.

7.2.2 Tandem Connect The Tandem Connect rate is assessed on a per minute of use basis and is applicable to all tandem routed Switched Access Service minutes of use. The rate will vary based on whether the traffic is originating or terminating.

Rates and charges for Tandem Connect are set forth in Section 7.4.4.2.

7.2.3 Toll-Free 8YY Transit Traffic Service

The Toll-Free 8YY Transit Traffic Service rates are assessed on a per minute of use basis. If the 8YY call is delivered to the IXC over DECTs, the Toll-Free 8YY Direct Transit Minute of Use Rate will apply. If the call is instead delivered to the IXC indirectly via another LEC tandem, Toll-Free 8YY Indirect Transit Minute of Use Rate will apply. These charges incorporate only the tandem switching, and appropriate portions of common multiplexing and tandem transport functionalities into the rate. Additionally, the 800 Data Base Basic Query Charge identified in Section 7.2.4 will apply on a per query basis.

7.2.4 800 Data Base Access Service Basic Query Charge The 800 Data Base Access Service Basic Query Charge applies for the identification of the interexchange carrier to whom a specific 800 number is to be delivered. This charge is assessed on a per query basis.

Access Services

SWITCHED ACCESS RATES (Cont.)

7.4 Rates and Charges (Cont.)

7.4.4 Switched Access

7.4.4.1 Direct Connect Charges

Direct Connect

| | <u>Maximum Rate</u> | <u>Current Rate</u> |
|-------------|---------------------|---------------------|
| Originating | \$0.0300 | \$0.006770 |
| Terminating | 0.0300 | \$0.006770 |

Direct Connect - Tandem Overflow

| | | |
|-------------|----------|------------|
| Originating | \$0.0200 | \$0.007680 |
| Terminating | 0.0300 | \$0.007680 |

7.4.4.2 Tandem Connect Charges

Tandem Connect

| | | |
|-------------|----------|------------|
| Originating | \$0.0300 | \$0.007680 |
| Terminating | 0.0300 | \$0.007680 |

7.4.4.3 Toll Free 8YY Transit Traffic Service

| | | |
|------------------------------------|------------|---|
| Per Direct Transit Minute of Use | \$0.001154 | N |
| Per Indirect Transit Minute of Use | \$0.001567 | N |

7.4.5 Chargeable Optional Features

7.4.5.1 500 Data Base Access Service Basic Query

Per Query
\$0.004000

7.4.5.2 Signaling Transfer Point Access

| Monthly | Non-Recurring | |
|-----------------|-----------------|------------------------|
| <u>Per Mile</u> | <u>Per Port</u> | <u>Via Third Party</u> |
| ICB | ICB | ICB |

7.4.6 Nonchargeable Optional Features

| <u>Supervisory Signaling</u> | <u>Maximum Rate</u> | <u>Current Rate</u> |
|------------------------------|---------------------|---------------------|
| | \$2.00 | \$0.00 |

7.4.7 Feature Group D Optional Features

7.4.7.1 Common Switching Optional Features

| | | |
|---|--------|--------|
| Alternate Traffic Routing | \$2.00 | \$0.00 |
| Automatic Number Identification | \$2.00 | \$0.00 |
| Call Through | \$2.00 | \$0.00 |
| Service Class Routing | \$2.00 | \$0.00 |
| Feature Group D with 950 Access | \$2.00 | \$0.00 |
| Signaling System Seven (SS7) | \$2.00 | \$0.00 |
| Basic Initial Address Message Delivery | \$2.00 | \$0.00 |
| Called Directory Number Delivery | \$2.00 | \$0.00 |
| Flexible Automatic Number Identification Delivery | \$2.00 | \$0.00 |

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T South Carolina”) and that she has caused the Petition of AT&T Companies to Institute Investigation of Verizon Access Tariff Filing and to Intervene to be served upon the following on May 21, 2008.

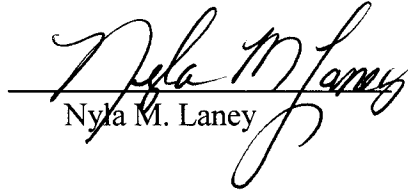
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